

FILED
At Albuquerque NM

MAY 07 2015 *kd*

MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LEON J. TAFOYA,

Defendant.

) CRIMINAL NO. 15-1631 mca

) Count 1: 18 U.S.C. §§ 924(c)(1)(A), and
924(c)(1)(A)(i-iii): Possessing a Firearm
in Furtherance of a Crime of Violence;

) Count 2: 18 U.S.C. §§ 1152 and 13:
N.M.S.A. 1978, § 30-3-2: Aggravated
Assault with a Deadly Weapon;

) Count 3: 18 U.S.C. §§ 1153 and
113(a)(6): Assault Resulting in Serious
Bodily Injury.

INFORMATION

The United States Attorney charges:

Count 1

On or about September 7, 2014, in Rio Arriba County, in the District of New Mexico, the defendant, **LEON J. TAFOYA**, knowingly possessed a firearm, Kimber Tactical Entry II .45 ACP Pistol, serial #K333644, in furtherance of a crime of violence for which **LEON J. TAFOYA** may be prosecuted in a court of the United States, namely Aggravated Assault with a Deadly Weapon as charged in Count 2 of this information.

In violation of 18 U.S.C. §§ 924(c)(1)(A), and 924(c)(1)(A)(i-iii).

Count 2

On or about September 7, 2014, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **LEON J. TAFOYA**, an Indian, did commit an assault of John

Doe 1, a non-Indian, by intentionally, knowingly, or recklessly exhibiting a firearm, in the immediate presence of John Doe 1 by displaying the firearm in a rude, angry, or threatening manner.

In violation of 18 U.S.C. §§ 1152 and 13, and N.M.S.A. 1978, § 30-3-2.

Count 3

On or about September 7, 2014, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **LEON J. TAFOYA**, an Indian, did knowingly and unlawfully assault John Doe 2, such assault resulting in serious bodily injury.

In violation of 18 U.S.C. §§ 1153 and 113(a)(6).

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